

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<i>Caption in Compliance with D.N.J. LBR 9004-1(b)</i> OBERMAYER REBMANN MAXWELL & HIPPEL LLP Edmond M. George, Esquire 1120 Route 73, Suite 420 Mount Laurel, NJ 08054-5108 Telephone: (856) 795-3300 Facsimile: (856) 482-0504 E-mail: edmond.george@obermayer.com <i>Counsel to Defendants, Javier Torres, Media Effective, LLC, Dora Dillman, Javier Torres, Jr., Natalia Torres, and Paulina Torres</i>	
In re: NATIONAL REALTY INVESTMENT ADVISORS, LLC, et al., ¹ Debtors.	Chapter 11 Case No. 22-14539-JKS (Jointly Administered)
AIRN LIQUIDATION TRUST CO., LLC, in its capacity as Liquidation Trustee of the AIRN LIQUIDATION TRUST, Plaintiff, v. MEDIA EFFECTIVE LLC, et al., Defendants.	Adv. Pro. No. 23-1335-JKS

**NOTICE OF MOTION OF JAVIER TORRES, MEDIA EFFECTIVE, LLC,
DORA DILLMAN, JAVIER TORRES, JR., NATALIA TORRES, AND
PAULINA TORRES FOR AN ORDER PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE 7052**

PLEASE TAKE NOTICE that on **July 19, 2024**, at **10:00 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard, Javier Torres (“Javier”), Media Effective, LLC (“Media”),

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/NRIA>.

Dora Dillman, Javier Torres, Jr., Natalia Torres, Paulina Torres (the “Torres Family,” and collectively with Javier and Media, the “Defendants”), by and through their undersigned counsel, will move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, Courtroom 3D, for entry of an order, substantially in the form submitted herewith, for an Order Pursuant to Fed. R. Bankr. P. 7052 (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Defendants shall rely upon the Motion submitted concurrently herewith, the Declarations of Javier Torres, Edmond George, and exhibits thereto.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless timely objection is received.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

Respectfully Submitted,

Dated: June 21, 2024

/s/ Edmond M. George

Edmond M. George, Esquire
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